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FEDERAL COMMUNICATIONS COMMISSION  
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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In re the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	MM Docket No.
Table of Allotments	)	RM-
FM Broadcast Stations	)	
(Greenwood, Mississippi)	)	

PETITION FOR RULE MAKING

Team Broadcasting Co., Inc. ("Team"), permittee of Station WGNL(FM), Channel 282C3<sup>1/</sup>, Greenwood, Mississippi, by its counsel, hereby requests the amendment of Section 73.202(b) of the Commission's Rules to substitute Channel 282C2 for Channel 282C3 at Greenwood and to modify Team's permit to specify Channel 282C2 pursuant to Section 1.420(g)(3) of the Commission's Rules. In support hereof, Team states as follows:

1. As indicated in the attached engineering statement, Channel 282C2 can be allocated to Greenwood consistent with the Commission's distance separation requirements in Section 73.207 of the Rules. See Exhibit E, Figure 1. The study takes into account the Commission's recent action in MM Docket No. 92-179 7 FCC Rcd 7575 (1992) in which Channel 282A was deleted from State College, Mississippi and replaced by Channel 283C3. That action was effective on January 4, 1993. In addition, the

<sup>1/</sup> Team's permit was modified to specify Channel 282C3 in MM Docket 89-368, 5 FCC Rcd 4681 (1990). Team has filed an application to implement that order which is currently pending BMPH 920908IJ.

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channel study protects Station WRVR-FM, Memphis, Tennessee, as a Class C channel. It appears that the Memphis station may have downgraded to Class C1 facilities. If so, then Station WGNL's current site would comply with Sec. 73.207. Team would prefer that the Commission propose Station WGNL's current site coordinates as the reference point (33°31' 30"N/90°09'52"W), if the Commission finds that those coordinates protect the Memphis station. In the alternative Team would accept the proposed coordinates (33°28'50"N/90°09'53"W). Both sites will provide city grade coverage to Greenwood. See Exhibit E, Figure 2.

2. If Team's request for a Class C2 channel substitution is approved, Team will file a minor change application to implement the modification of its permit to specify the Class C2 Channel at Greenwood.

3. Accordingly, Team respectfully requests the substitution of Channel 282C2 for Channel 2823 at Greenwood and the modification of its permit to specify the new class of channel.

Respectfully submitted

TEAM BROADCASTING CO., INC.

By:

  
Mark N. Lipp

Mullin, Rhyne, Emmons and Topel, P.C.  
1000 Connecticut Avenue, Suite 500  
Washington, D.C. 20036  
(202) 659-4700

Its Attorney

March 19, 1993

# **ENGINEERING STATEMENT**

**In Support of a**

## **PETITION FOR RULE MAKING**

**DELETING CHANNEL 282C3, GREENWOOD, MISSISSIPPI  
SUBSTITUTING CHANNEL 282C2, GREENWOOD, MISSISSIPPI**

**TEAM BROADCASTING, INC.**

Previously channel 282A was deleted and substituted with channel 282C3. The construction permit of WGNL(FM), Greenwood was modified accordingly. Team Broadcasting, Inc., the permittee presently operating WGNL(FM) on this channel, under automatic program test authority, timely filed a Form 301 for modification of its existing class A CP.

Recently the Commission deleted channel 282A and substituted channel 283C3 at State College, Mississippi. This deletion on the WGNL co-channel of 282 makes it possible for an additional upgrade at Greenwood. The instant petition request that channel 282C3 at Greenwood be deleted and channel 282C2 be substituted.

Exhibit E, figure 1 is an allocations study using study coordinates that offer the necessary separations to all known co-channel and adjacent channel stations, applications and petitions. Reference coordinates were chosen that give the required protection to WRVR(FM), Memphis, TN as a class C. However, it appears WRVR has voluntarily down graded to a class C1. If this down grade has occurred, the present

operating site of WGNL as a class A could be used as reference for the allocation of channel 282C2. Until this down grade is established as a fact by Team's consultant, team request that the coordinates used in the this study be used.

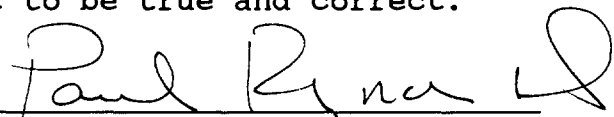
Exhibit E, figure 1 is a computer generated contour chart demonstrating that a location window exist for a tower site when channel 282C2 is allocated to Greenwood. Additionally, it is obvious that the community of Greenwood is well within the 70 dBu contour (city grade) of a class C2 station using the Team reference coordinate.

Channel 282C2 can be allocated to Greenwood in keeping with the Commission's minimum distance separations chart now that channel 282A has been deleted at State College, Mississippi. A large antenna location window exist for this allocation, and can become larger if WRVR has down graded.

## CERTIFICATION

I, Paul Reynolds, hereby certify the following: that I am an independent broadcast consultant; that I hold a Bachelor of Science degree in Communications from the University of Southern Mississippi and have compiled work for a Masters Degree in Communications from the University of Alabama. I have been a practicing consultant since 1980, and I am familiar with the Commission's rules and regulations. I have filed numerous petitions and applications in association with Amerimedia, Inc., and my qualifications are known in the industry and at the Commission. All information in this engineering statement was prepared by me, or under my direct supervision.

I have been retained by Team Broadcasting Company, Inc., to prepare this engineering statement to a Notice of Proposed Rule Making. The statement was based on the data available from the Commission and believed to be accurate on this date. However, the data is subject to change without notice and, therefore, I (Paul Reynolds) can accept no responsibility as to the complete accuracy of this statement, although I believe it to be true and correct.

Signed   
PAUL REYNOLDS, CONSULTANT

THIS 16<sup>th</sup> DAY OF FEBRUARY, 1993

**415 NORTH COLLEGE STREET  
GREENVILLE, ALABAMA 36037  
(205) 382-2940**

# ENGINEERING STATEMENT

In Support of a

## PETITION FOR RULE MAKING

Deleting Channel 282C3, Greenwood, Mississippi  
Adding Channel 282C2, Greenwood, Mississippi

TEAM BROADCASTING COMPANY, INC.

### ALLOCATION STUDY

[USING STUDY COORDINATES AS REFERENCE]

33 28 50 N. Class C2 Search Date  
90 09 35 W. Current rules spacings 02-01-93

Channel 282 -104.3 MHz  
Call Ch# City State Bear' Dist' R'grd Margin

**WGNL.C 282C3 Greenwood MS 213.3 15.25 177.0 -161.75 \***  
Of no Concern  
Present Modified CP Site of Permittee

**WGNL.C 282A Greenwood MS 354.9 4.95 166.0 -161.05 \***  
Of no Concern  
Present Operating Site of Permittee

**ALOPEN 282C3 Greenwood MS 323.1 16.11 177.0 -160.89 \***  
Of no Concern  
Allocation of Permittee's C3 Channel

**WUMI.C 282A State College MS 91.4 129.54 166.0 -36.46 \***  
Of no Concern  
Channel 282A Deleted & Channel 283C3 Added  
MM Docket 92-179

**WRVRFM 283C Memphis TN 9.5 188.29 188.0 0.29 \***

**AD283 283C3 State College MS 94.3 119.03 117.0 2.03 \***  
Channel 282A Deleted  
Instant Channel Added  
MM Docket 92-179

**WCLDFM 280A Cleveland MS 298.6 58.59 55.0 3.59 \***

**WYBJ.C 284C2 Greenville MS 269.9 66.53 58.0 8.53 \***

**WZBR.C 280A Ebenezer MS 182.5 65.86 55.0 10.86**

**WZBR.A 280A Ebenezer MS 182.8 65.91 55.0 10.91**

**ALOPEN 281C2 Union MS 137.8 141.77 130.0 11.77**

**AP281 281C2 Union MS 138.2 142.09 130.0 12.09**

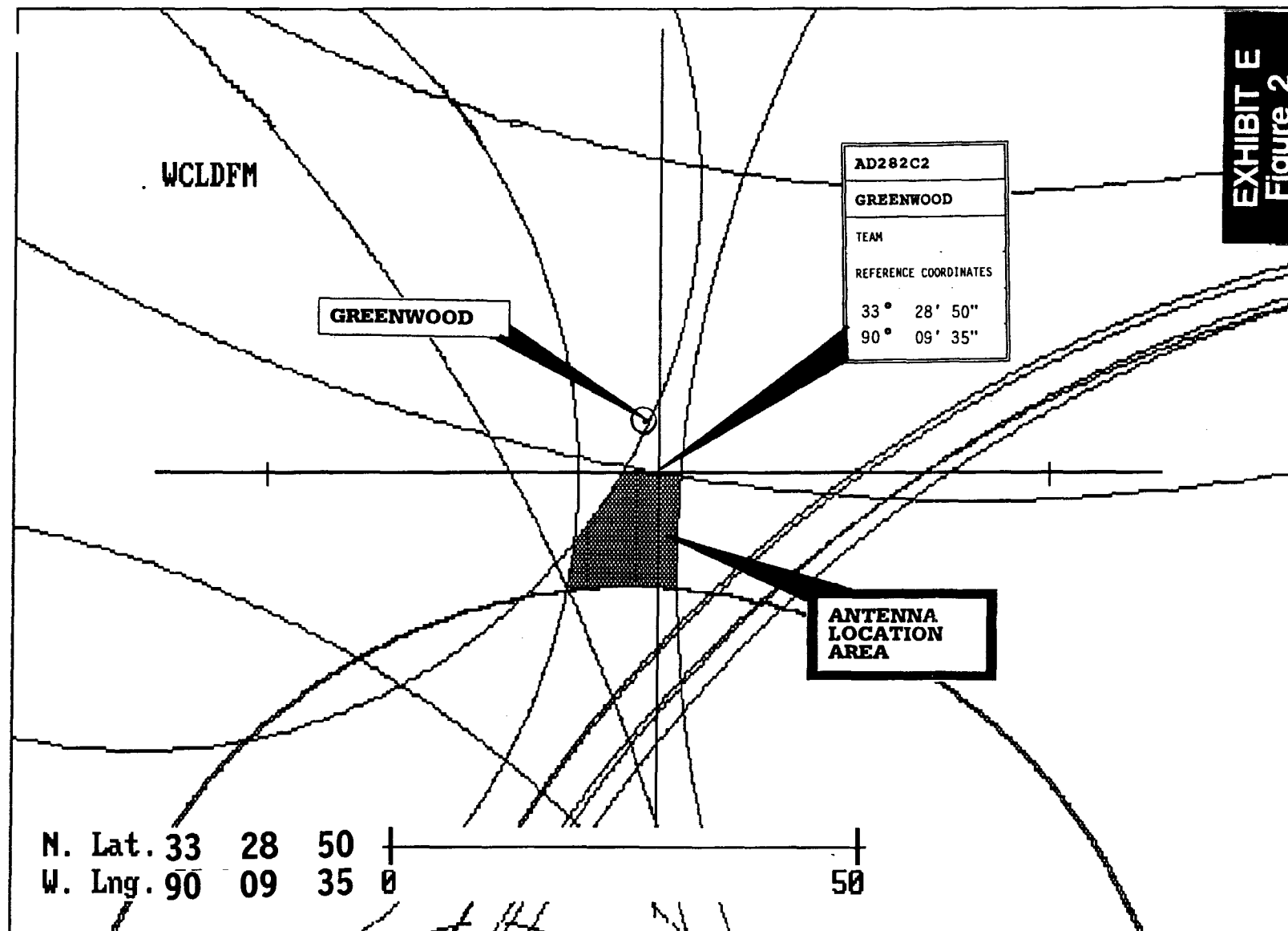
**KJLOFM 281C Monroe LA 243.2 201.71 188.0 13.71**

**WRVRFM 283C1 Memphis TN 9.5 188.29 158.0 30.29**

**KBYOFM 283C3 Tallulah LA 216.4 148.56 117.0**

**WAZFFM 229A Yazoo City MS 196.2 61.17 15.0**

**EXHIBIT E  
Figure 1**



**EXHIBIT E**  
**Figure 2**

CERTIFICATE OF SERVICE

I, Joan M. Trepal, a secretary in the law firm of Mullin, Rhyne, Emmons and Topel, P.C., do hereby certify on this 19th day of March, 1993, that I have caused a copy of the foregoing "Petition for Rule Making" to be delivered to the office of the following:

Kathleen Scheuerle  
Allocations Branch  
Federal Communications Commission  
2025 M Street, N.W.-- Room 8314  
Washington, D.C. 20554

  
Joan M. Trepal